

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

BRYON PARFFREY §
§
v. § **Civil Action No: 4:21-cv-03151**
§
PHH MORTGAGE CORPORATION §

PLAINTIFF'S EXPERT DESIGNATIONS

Comes now Plaintiff, Bryon Parffrey, and submits this designation of expert witnesses.

Plaintiff reserves the right to supplement or amend this designation of experts witnesses with additional expert witness within the time limits imposed by the Court or any alterations of same by subsequent Court order, agreement of the parties, or pursuant to the Rules applicable in this matter.

1. Erick DeLaRue

The Law Office of Erick DeLaRue, PLLC
2800 Post Oak Blvd, Suite 4100
Houston, Texas 77056
713-899-6727

Erick DeLaRue may testify as to the reasonableness, necessity of, and amount of attorneys' fees incurred in the above matter and the reasonable amount of attorneys' fees in similar cases in the Southern District of Texas and the State of Texas. Mr. DeLaRue will base his testimony on his knowledge of the work performed on this matter; his experience as a licensed attorney; his experience in cases involving issues similar to those present in this case; his knowledge of the usual and customary attorneys' fees charged in the Southern District of Texas and the State of Texas for similar representation; the skill required to perform the legal services properly; the

time limitations imposed by the client or by the circumstances; the nature and length of the professional relationship with the client; the expertise, reputation and ability of counsel; the extent of responsibility assumed; the benefits to be derived; and the costs and expenses incurred. Mr. DeLaRue may testify by affidavit.

Mr. DeLaRue reserves the right to supplement any report based upon the final amount of attorney fees and expenses claimed by Plaintiff, any defendant in the lawsuit, and other developments in the litigation. Mr. DeLaRue is employed as an attorney for Plaintiff, and he is not receiving any additional compensation for his testimony.

2. Any fact witnesses presented by the defendant may also provide expert testimony. Plaintiff reserves the right to call or present, by direct examination or cross examination, testimony and/or evidence obtained from those alleged expert witnesses designated by Defendant. Any materials relied upon by such witnesses are hereby designated. Plaintiff reserves the right to call the expert or opinion witnesses designated by any and all other parties in this matter, or utilize the expert or opinion testimony of any witness deposed in this case, and reserves the right to call and designate additional expert witnesses in rebuttal, and to challenge the qualifications, conclusions, and opinions of any expert witnesses designated or called by any party offering testimony against the interests of Plaintiff. Plaintiff reserves the right to request leave of Court to designate additional experts if doing so should become necessary at a later time. Further, Plaintiff reserves whatever additional rights they may have regarding experts, pursuant to the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the case law construing same, and

any rulings of the trial court.

Respectfully Submitted by,

Law Office of Erick DeLaRue, PLLC

By: /s/ *Erick DeLaRue*
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ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on June 10, 2022, a copy of the above and foregoing was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing has been forwarded to all parties, by and through their attorneys of record, by operation of the Court's electronic filing system or by other means in accordance with the FEDERAL RULES OF CIVIL PROCEDURE.

Via Court's ECF E-Filing System and/or Via Email.

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/s/ *Erick DeLaRue*
ERICK DELAURE